

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

(1) JOSHUA FIELDS)	
)	
Plaintiff,)	
)	
v.)	Case No. 21-cv-00986-G
)	
(1) GREAT LAKES INSURANCE SE,)	<i>Removed from the District Court of</i>
)	<i>Kay County, State of</i>
(2) MJ KELLY COMPANY, and)	<i>Oklahoma, Case No. CJ-2021-00037</i>
)	
(3) CAPSTONE ISG,)	
)	
Defendants.)	

PLAINTIFF’S OBJECTIONS TO DEFENDANT’S PROPOSED JURY INSTRUCTIONS

COMES NOW Plaintiff, Joshua Fields, and objects to Defendant’s Proposed Jury Instruction Nos. 11, 15, 21, 23, 27, 28, 29, 30, 31, 32, 33, 35, 36, 37, 38, 39, 42, 44 and the proposed verdict form on the claims for breach of contract and bad faith. Plaintiff objects to these proposed instructions because the instructions either, or collectively, misstate the law applicable to the case, misstate facts in the case, and instruct the jury on matters of law or facts not at issue in this case.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on the 14th day of November 2022, I electronically transmitted the attached document to the Clerk of the Court using the ECF System for filing. Based on the records currently on file, the Clerk of the Court will transmit a Notice of Electronic Filing to the following ECF registrants, via email:

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